

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION)	MDL No. 2804
OPIATE LITIGATION)	
)	Case No. 1:17-md-2804
THIS DOCUMENT RELATES TO:)	
)	Judge Dan Aaron Polster
ALL CASES)	
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)	

PLAINTIFFS' MOTION FOR ENTRY OF REVISED PROTECTIVE ORDER

Plaintiffs submit this motion for entry of a revised protective order in the above-captioned case. Plaintiffs submit this motion without any objection from Defendants.

The Court earlier entered Case Management Order No.2: Protective Order. See docket no. 441 ("Protective Order") (filed 05/15/18). Exhibit A to the Protective Order is an acknowledgement form, which must be signed by any attorney, party, Attorney General, expert, or other entity who receives documents through MDL proceedings. Signers of this form acknowledge they have read and understand the Protective Order and agree to be bound by its terms.

Several Attorneys General have asked that minor amendments be made to the acknowledgement form for purposes of clarification that execution of the form does not submit those Attorneys General to the jurisdiction of the Court except as relates to the enforcement of the Protective Order. Accordingly, attached to this Motion is an alternative "Exhibit A" to the Protective Order. The alternative form is identical to the Acknowledgment to the ARCOS

Protective Order (Doc #: 602-1) (Filed: 06/11/18). Entities seeking access to discovery produced in the MDL may sign either the original or alternative version of "Exhibit A."

WHEREFORE, Plaintiffs respectfully request this Honorable Court to grant the Plaintiffs' Motion for Entry of Revised Protective Order.

Respectfully submitted,

s/Paul T. Farrell, Jr.

Paul T. Farrell, Jr., Esq.

GREENE KETCHUM, LLP

419 Eleventh Street

Huntington, WV 25701

phone: 304.525.9115

facsimile: 304.529.3284

email: paul@greeneketchum.com

Plaintiffs' Co-Lead Counsel

s/Peter H. Weinberger

Peter H. Weinberger (0022076)

SPANGENBERG SHIBLEY & LIBER

1001 Lakeside Avenue East, Suite 1700

Cleveland, OH 44114

phone: 216.696.3232

facsimile: 216.696.3924

email: pweinberger@spanglaw.com

Plaintiffs' Co-Liaison Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 17, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. The Court's electronic filing system will send notice of this filing to all parties. Parties may access this filing through the CM/ECF System.

s/Peter H. Weinberger

Peter H. Weinberger